



# MEMO ENDORSED

September 17, 2021

**Via ECF**

Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 9/17/2021

**Re: *Safe Passage Project v. U.S. Customs and Border Protection, et al.*, No. 1:21-cv-03288-VEC**  
**Joint Request for Adjournment of Initial Pretrial Conference**

Dear Judge Caproni:

On behalf of the parties, Plaintiff writes to respectfully request that the Court adjourn the initial pretrial conference in the above referenced matter, currently scheduled for September 24, 2021 at 10:00 am by teleconference, and the filing of the joint letter, currently due on September 17, 2021, for one month. This is the parties' fifth request for an adjournment of the initial pre-trial conference.

Through negotiation, the parties have resolved all disputes in the instant Freedom of Information Act action except for the issue of attorneys' fees and costs. Defendant U.S. Citizenship and Immigration Services made its final production on September 9, 2021. The parties now request that the conference is adjourned to permit the parties to seek to resolve this remaining issue without further intervention by this Court.

The parties request that the conference is adjourned for one month and propose that the conference is re-scheduled for October 22, 2021 or a date that is convenient for the Court.

Respectfully submitted,

s/ Kristin Macleod-Ball

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cc: Rebecca Friedman, Counsel for Defendants

Application GRANTED. The initial pretrial conference is adjourned to **October 22, 2021 at 10:00 a.m.** The parties must appear for the conference by dialing 888-363-4749, using the access code 3121171 and the security code 3288. The parties' joint submission is due by **October 14, 2021.**

SO ORDERED.



9/17/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE